



EPA Region 5 Records Ctr.



309160

780 NORTH WATER STREET  
MILWAUKEE, WI 53202-3590  
TEL 414-773-3503  
FAX 414-773-5198  
www.gklaw.com

GODFREY & KAHN, S.C.  
MILWAUKEE  
APPLETON  
GREEN BAY  
WAUKESHA

LAFOLLETTE GODFREY & KAHN  
MADISON

September 16, 2005

VIA FACSIMILE

Ms. Eileen Furey  
Associate Regional Counsel  
United States EPA, Region 5  
77 Jackson Boulevard, C14-J  
Chicago, IL 60604-0747

RE: Plainwell Papers, Inc., Disposal of Remaining Chemicals and Materials

Dear Eileen:

As we have discussed, Plainwell Papers, Inc. ("Plainwell") intends to remove and dispose of chemicals and materials remaining at its closed facility located at 200 Allegan Street, Plainwell, Michigan (the "Facility"). The Facility was previously identified as a Conditionally Exempt Small Quantity Generator ("CESQG") under EPA ID #MID053666228. However, the removal of these chemicals and materials will likely exceed the CESQG thresholds. In addition, according to Ms. Julie Blanchard at the Michigan Department of Environmental Quality ("MDEQ"), the EPA ID number for the Facility has been "deactivated" because the Facility was no longer generating wastes. Ms. Blanchard requested that Plainwell submit a letter to MDEQ indicating Plainwell's intent to remove these chemicals and materials and MDEQ would reactivate the EPA ID number. Ms. Blanchard also requested that the letter indicate a change in generator status from a CESQG to a Large Quantity Generator ("LQG"). A copy of the correspondence to the MDEQ is attached for your review.

I have discussed the removal of these chemicals and materials with you and have requested U.S. EPA's permission to remove these chemicals and materials. You indicated they you thought this removal of chemicals and materials would be acceptable to U.S. EPA, but requested that I send you a letter specifying the chemicals and materials that is being removed. I am attaching a list of the chemicals and materials to this letter. We would like to have Onyx Environmental Services removed the materials on September 26-27, 2005.


Eileen, please send me a letter confirming U.S. EPA's permission to remove the chemicals and materials on the attached list.

Ms. Eileen Furey  
Associate Regional Counsel  
United States EPA, Region 5  
September 16, 2005  
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If you have any concerns or questions regarding this course of action, please contact me immediately so we may discuss this matter in more detail. Thank you so much for your help.

Very truly yours,

GODFREY & KAHN, S.C.

  
*for* Pamela E. Barker

SJZ:smr  
Enclosure  
MW985028\_3



730 NORTH WATER STREET  
MILWAUKEE, WI 53102-3590  
TEL 414-273-3500  
FAX 414-273-5198  
www.gklaw.com

GODFREY & KAHN, S.C.  
MILWAUKEE  
APPLETON  
GREEN BAY  
WAUKESHA

LAFOLETTE GODFREY & KAHN  
MADISON

September 16, 2005

VIA FACSIMILE

Julie Blanchard  
Analyst  
Michigan Department of Environmental Quality  
P.O. Box 30241  
Lansing, MI 48909

RE: Plainwell Paper Company EPA ID # Reactivation

Dear Ms. Blanchard:

As you discussed with my colleague Steve Ziesmann on September 15, Plainwell Paper Company ("Plainwell") is no longer operating the facility located at 200 Allegan Street, Plainwell, Michigan (the "Facility"). Accordingly, Plainwell would like to remove chemicals and materials still remaining at the Facility. In your conversation with Steve, you had indicated that Michigan Department of Environmental Quality ("MDEQ") records show that the EPA ID Number (MID053666228) for the Facility had been "deactivated" because the Facility was no longer generating waste materials. You also indicated that MDEQ records list the Facility as a Conditionally Exempt Small Quantity Generator ("CESQG").

Per your instructions, this correspondence notifies MDEQ that Plainwell intends to remove and dispose of the chemicals and materials indicated on the attached list. Accordingly, the Facility EPA ID number should be reactivated for this one-time activity. In addition, because the removal and disposal of these chemicals and materials will likely exceed CESQG thresholds, this letter also notifies MDEQ of a change in generator status from CESQG to a Large Quantity Generator. Plainwell is in the process of contracting with Onyx Environmental Services ("Onyx") to perform the removal and disposal of these chemicals and materials on September 26-27.

Julie Blanchard  
Analyst  
Michigan Department of Environmental Quality  
September 16, 2005  
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If you have any questions or require additional information, please contact me at your convenience. In addition, please use my name and address as the contact person for this matter.

Very truly yours,

GODFREY & KAHN, S.C.



*for* Pamela E. Barker

SJZ:smr  
Enclosure  
cc: Steven Ziesmann

MW1005058\_1.DOC

## Chemical Products Inventory

Item #	Description	Unit	Quantity
1.	Unknown Liquid	55-Gallon Drum	1
2.	Tinting Pigment Blue NB-58 Liquid (phosphomolybdic pigment)	5-Gallon Container	1
3.	Aquamax IEC2 Resin Cleaner (citric acid)	55-Gallon Drum	1
4.	Antifoam 116 (mineral oils)	55-Gallon Drum	1
5.	Antifoam 116 (mineral oils)	5 Gallon Container	1
6.	BULAB 4402 (petroleum oils)	55-Gallon Drum	1
7.	Unknown Liquid	55-Gallon Drum	1
8.	Unknown Solid	55-Gallon Drum	1
9.	Paraform P-197 (fatty alcohols)	55-Gallon Drum	1
10.	Sodium Hypochlorite (solid)	20-Gallon Drum	3
11.	Unknown Solid	25-Gallon Drum	1
12.	Unknown Solid	5-Gallon Container	1
13.	LAW573005 VETAK (polyvinyl acetate emulsion)	55-Gallon Drum	1
14.	X-3801 (synthetic resin)	55-Gallon Drum	1
15.	Unknown Solid	55-Gallon Drum	1
16.	DG-903 (sodium hydroxide, EDTA)	55-Gallon Drum	1
17.	Unknown Solid	55-Gallon Drum	1
18.	BETZ LAYUP-1 (diethanolamine, hydroquinone)	55-Gallon Drum	1
19.	IONAC C-249 (diethenylbenzene)	55-Gallon Drum	2
20.	Phosphoric Acid	55-Gallon	1

Item #	Description	Unit	Quantity
		Drum	
21.	Unknown Liquid	55-Gallon Drum	1
22.	Unknown Liquid	55-Gallon Drum	1
23.	A300 (Quaternary amine styrene divinylbenzene copolymer in the Chloride form)	30-Gallon Drum	1
24.	DREWFLOC 2230 F POLMER (Trade Secret Polymers)	275-Gallon Tote	1
25.	AF-410 Cationic Emulsion (cationic polyacrylamide)	55-Gallon Drum	1
26.	Freon TF Fluorocarbon Solvent (trichlorotrifluoroethane)	5-Gallon Container	
27.	Unknown Liquid	55-Gallon Drum	1
28.	Unknown Liquid	55-Gallon Drum	1
29.	Perform PA8230 [Solid]	350-Pound Bag	1
30.	Nalclean 66 [Solid]	350-Pound Drum	3
31.	Talc	50-Pound Bag	2
32.	Beaver Solvent (petroleum distillates)	55-Gallon Drum	2
33.	Dissolvine D-40 (sodium hydroxide, trisodium nitrilotriacetate)	55-Gallon Drum	1
34.	Unknown Liquid	55-Gallon Drum	1
35.	Soda Ash	75-Pound Bag	1
36.	Isopropyl Alcohol	5-Gallon Container	1
37.	20% Ammonia Solution	Gallons	2,000
	[NOTE: The contents remaining in the above-ground storage tank is estimated to be 2,000 gallons.]		